

EXHIBIT 4

Damage Calculation - Pape v. SCSPCA, et al.

Summary of All Damages

Investigator Damages	Unpaid Wages	\$43,732.03
	Liquidated Dmg.	\$43,732.03
Academy Damages	Unpaid Wages	\$4,631.25
	Liquidated Dmg.	\$4,631.25
Total Unpaid Wages		
& Liquidated Dmgs:		\$96,726.56
NYLL 195(1) Penalty		\$5,000.00
NYLL 195(3) Penalty		\$5,000.00
Lost Wages:		\$25,950.00
Emotional Distress:		\$50,000.00
Retaliation:		\$150,000.00
Total:		\$332,676.56
Attorneys' Fees:		\$110,892.19
Total Damages:		\$443,568.75

Plaintiff also seeks immediate reinstatement to the SCSPCA. Furthermore, Defendants must retract the false and inaccurate representations made to the New York State Department of Criminal Justice Services that resulted in the revocation of her status as a New York State Peace Officer.

Damage Calculation - Pape v. SCSPCA, et al.**Damages for Unpaid OT as Employee**

Time-Period	Number of Weeks	Hours/Week	Regular		OT Rate	OT Hours	OT Owed/Week	OT Wages Owed
			Rate					
Jan. 1, 2018 - Feb. 6, 2018	5	60	\$19.50		\$29.25	20	\$585.00	\$2,925.00
March 15, 2018 - June 30, 2018	15	60	\$19.50		\$29.25	20	\$585.00	\$8,775.00
July 1, 2018 - Dec. 31, 2018	26	60	\$21.63		\$32.44	20	\$648.75	\$16,867.50
Jan. 1, 2019 - April, 2019	17	60	\$21.63		\$32.44	20	\$648.75	\$11,028.75
May, 2019 - Dec. 31, 2019	35	42.5	\$21.63		\$32.44	2.5	\$81.09	\$2,838.28
Jan. 1, 2020 - April 20, 2020	16	42.5	\$21.63		\$32.44	2.5	\$81.09	\$1,297.50
						Unpaid Wages		\$43,732.03
						Liquidated Dmg.		\$43,732.03

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Damages for Unpaid Wages during Academy

Time-Period	Number of Weeks	Hours/Week	Weekly Pay	Hourly Wage	Min. Wage Hours	Min. Wage Owed/Week	Min. Wage Owed
Feb 6, 2018 - March 15, 2018	5	45	\$0.00	\$19.50	\$40.00	\$780.00	\$3,900.00

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OT			
OT Rate	OT Hours	Owed/Week	OT Wages Owed
\$29.25	5	\$146.25	\$731.25
Unpaid Wages			\$4,631.25
Liquidated Dmg.			\$4,631.25

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Damages for Back Wages

Date of Termination	Number of Weeks Since Termination	Weekly Pay	Wages Owed to Date
4/20/2020	30	\$865.00	\$25,950.00